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8 **IN THE UNITED STATES DISTRICT COURT**  
9 **FOR THE WESTERN DISTRICT OF WASHINGTON**

10 JASON DELANEY DRAWHORN,

11 Plaintiff,

12 v.

13 APARTMENT MANAGEMENT  
14 CONSULTANTS, LLC,

15 Defendant.  
16

Case No.

**COMPLAINT**

**JURY DEMAND**

17 **I. NATURE OF ACTION**

18 1.1 Jason Delaney Drawhorn brings this civil action to redress the sexual  
19 harassment and assault he suffered while working as an Assistant Property Manager at  
20 Apartment Management Consultants, LLC.

21 **II. JURISDICTION AND VENUE**

22 2.1 This Court has subject matter jurisdiction over Mr. Drawhorn's claim pursuant  
23 to 28 U.S.C. § 1332(a)(1).

24 2.3 Venue properly rests with this Court pursuant to 28 U.S.C. § 1391(b)(2).  
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1 **III. PARTIES**

2 3.1 Plaintiff Drawhorn is a citizen of the State of Washington. At all times pertinent  
3 to this complaint, Mr. Drawhorn was protected by the Washington Law Against Discrimination  
4 (“WLAD”), RCW 49.60.

5 3.2 Defendant Apartment Management Consultants, LLC (hereinafter “AMC”) was  
6 incorporated in Utah and the company’s principal place of business is Utah. AMC is registered,  
7 and doing business, in the State of Washington. Defendant AMC is a covered employer under  
8 the WLAD.

9 **IV. FACTS**

10 4.1 Mr. Drawhorn is a gay man who began working for AMC as a Leasing Agent in  
11 March 2020. In July 2020, he was promoted to Assistant Property Manager of the Water’s  
12 Edge property in Kent, Washington.

13 4.2 On December 17, 2021, AMC held its annual Christmas party at Sam’s Tavern  
14 in Redmond, Washington. The party was a paid work event that began in the early afternoon.  
15 Mr. Drawhorn attended the party with his friend and co-worker, Craig McKee. Mr. Drawhorn  
16 was a designated driver and was not drinking at the party, but other attendees were drinking  
17 heavily.

18 4.3 During the party, and well in view of other AMC employees and managers,  
19 AMC Property Manger Natalia Lawski began dancing and “grinding,” backing her butt into  
20 Mr. Drawhorn’s crotch. The unwanted sexual contact made Mr. Drawhorn deeply  
21 uncomfortable, and he tried to back away or play it off. At a later point in the party when Mr.  
22 Drawhorn was sitting down, Ms. Lawski climbed onto his lap and started bouncing up and  
23 down to simulate sexual intercourse. Mr. Drawhorn was deeply embarrassed and wanted to  
24 shove Ms. Lawski off of him, but was concerned about how other people, including his  
25 supervisors, would react.

26 4.4 Mr. Drawhorn waited for the company awards ceremony to conclude and  
27 prepared to leave. He approached Regional Property Manager Erik Miller to say goodbye and

1 wish him and his family a merry Christmas. Mr. Miller said, “You’re leaving?!” Mr. Drawhorn  
2 explained that he had to work in the morning. Mr. Miller then reached out and grabbed Mr.  
3 Drawhorn’s genitals. Mr. Drawhorn was shocked and did not know what to do. He turned  
4 around and quickly walked away.

5 4.5 Mr. Drawhorn wanted to leave the party immediately but needed to wait for Mr.  
6 McKee. Therefore, Mr. Drawhorn went to say goodbye to another Property Manager, Amanda  
7 Zayas. Ms. Lawski was standing beside Ms. Zayas. After Mr. Drawhorn said goodbye to Ms.  
8 Zayas, Ms. Lawski reached over and forcefully grabbed Mr. Drawhorn’s genitals. Ms. Zayas  
9 witnessed the interaction, told Ms. Lawski to stop, and pushed Ms. Lawski’s arm away from  
10 Mr. Drawhorn.

11 4.6 Mr. Drawhorn left the party as quickly as he could. As he walked out, Mr.  
12 Drawhorn burst into tears and told Mr. McKee he had been sexually assaulted. He was  
13 humiliated, in pain, and sobbing.

14 4.7 When Mr. Drawhorn and Mr. McKee arrived at the apartment complex, they  
15 called Regional Property Manager Emily Foster to report the assaults. Ms. Foster acknowledged  
16 that she and AMC Washington Vice President Samantha Balcos had both observed Ms.  
17 Lawski’s behavior at the party and that her behavior “was not okay.”

18 4.8 After Mr. Drawhorn and Mr. McKee left the party, one of the bartenders at  
19 Sam’s Tavern called the police to report Ms. Lawski’s drunken and belligerent behavior.

20 4.9 AMC brushed off Mr. Drawhorn’s report of sexual harassment and assault.  
21 Employee Relations Manager Taylor Terry spoke to Mr. Drawhorn once on the phone and then  
22 called him the next day to inform him that AMC “had concluded its investigation” and that he  
23 should contact them if he has any other concerns. AMC did not speak to Mr. McKee – or any  
24 other witness – before concluding the purported “investigation.” AMC took no action to  
25 remediate the sexual harassment and assaults.

26 4.10 Mr. Drawhorn filed a police report with the Redmond Police Department. The  
27 City of Redmond Prosecutor charged Ms. Lawski with Assault in the Fourth Degree.

1           4.11   Mr. Drawhorn resigned from AMC on June 30, 2022.

2                               **V.     FIRST CAUSE OF ACTION**  
3                               **HOSTILE WORK ENVIRONMENT UNDER RCW 49.60**

4           5.1    Plaintiff realleges paragraphs 4.1 to 4.11 as if fully set forth herein.

5           5.2    The Washington Law Against Discrimination (“WLAD”), RCW 49.60 *et seq.*,  
6 prohibits the creation of and maintenance of a sexually hostile work environment.

7           5.3    Defendant AMC subjected Mr. Drawhorn to discriminatory treatment on the  
8 basis of sex by creating and maintaining a sexually hostile work environment.

9           5.4    Mr. Drawhorn was subject to severe, offensive, and unwelcome actions on the  
10 basis of sex.

11           5.5    Defendant AMC is vicariously liable for Ms. Lawski’s and Mr. Miller’s  
12 unlawful conduct towards Mr. Drawhorn because at the time of those actions, they were both  
13 managers at the company. Alternatively, defendant AMC is liable for Ms. Lawski’s and Mr.  
14 Miller’s unlawful conduct towards Mr. Drawhorn because it knew or should have known about  
15 the sexual harassment but failed to take adequate remedial action.

16           5.6    As a direct and proximate result of the defendant’s unlawful conduct, Mr.  
17 Drawhorn has suffered and continues to suffer lost wages and benefits, emotional distress, and  
18 humiliation, in amounts to be proved at trial.

19                               **VII.   REQUEST FOR RELIEF**

20           WHEREFORE, Plaintiff requests the following relief:

21           A.     Damages including, but not limited to, lost wages, including front and back pay;  
22 lost medical, retirement, and other employment benefits; and other lost pecuniary benefits of  
23 employment in amounts to be proved at trial;

24           B.     Compensatory damages for the harm Mr. Drawhorn has suffered, including, but  
25 not limited to, emotional distress, humiliation, loss of enjoyment of life, mental anguish, and  
26 reputational harm, in an amount to be proven at trial;

1 C. Reasonable attorney's fees, expert witness fees, and costs and expenses pursuant  
2 to RCW 49.60.030(2) and all other applicable statutes;

3 D. Pre- and post-judgment interest at the maximum rate allowed by law; and

4 E. Damages to make up for any adverse tax consequences of any award to Mr.  
5 Drawhorn;

6 F. A declaratory judgment that AMC's actions violated the WLAD; and

7 G. Such other and further relief as the Court may deem appropriate.

8 **VIII. JURY DEMAND**

9 Plaintiff demands a trial by jury of all issues so triable pursuant to Rule 38 of the  
10 Federal Rules of Civil Procedure.

11 Dated this 19<sup>th</sup> day of August, 2022.

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13 FRANK FREED SUBIT & THOMAS LLP

14  
15 By: s/ Jillian M. Cutler

Jillian M. Cutler, WSBA No. 39305

16 By: s/ Jack N. Miller

Jack N. Miller, WSBA No. 57007

17 705 Second Avenue, Suite 1200

18 Seattle, Washington 98104

Phone: (206) 682-6711

19 Fax: (206) 682-0401

Email: [jcutler@frankfreed.com](mailto:jcutler@frankfreed.com)

20 [jmiller@frankfreed.com](mailto:jmiller@frankfreed.com)

21 *Attorneys for Plaintiff*  
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23  
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25  
26  
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